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August 23, 2012

MEMO ENDORSED

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BY FACSIMILE

The Honorable Laura Taylor Swain United States District Court for the Southern District of New York Daniel Patrick Moynihan U.S. Courthouse 500 Pearl Street, Courtroom 11C New York, New York 10007

Re: Williamson v. Verizon Communications Inc. et al., Case No. 1:11-cv-04948 (LTS)

Dear Judge Swain:

We represent Defendants AT&T, Inc., AT&T Operations, Inc., and AT&T Services, Inc. ("AT&T") in the above-referenced action, and write to request permission to file confidential documents under seal. No protective order has yet been entered in this case, though the parties are actively preparing and conferring on a form of stipulated protective order to be submitted for the Court's consideration.

AT&T is filing their responsive claim construction brief on August 24, 2012. One of the exhibits AT&T seeks to submit in support has been designated Confidential Information. We respectfully request that the Court enter an Order permitting AT&T to file the exhibit under seal.

AT&T has good cause for this request because the exhibit contains information designated confidential by Plaintiff. AT&T has conferred with counsel for Plaintiff in good faith and Plaintiff does not oppose this request for under seal filing.

Respectfully submitted,

Richard Harper

RH:jpm

cc: All Counsel of Record (via email)

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:

DATE FILED: <u>AUG 2 7 2012</u>

The request is granted. Defendants to file reducted

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documents on

ECF.

NEW YORK, NY

LAURA TAYLOR SWAIN

109 / 27, 2012 UNITED STATES DISTRICT JUDGE

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